

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION F18

THE STATE OF INDIANA

vs.

SUSANN RADFORD B/F 12/10/1953  
CAUSE NO. 49F181104FD027994  
(AS TO COUNT(S) I and II)

) INFORMATION  
) COUNT I  
) EXPLOITATION OF AN ENDANGERED  
) ADULT, CLASS D FELONY, I.C. 35-  
) 46-1-12  
) COUNT II  
) THEFT, CLASS D FELONY I.C. 35-43-  
) 4-2  
) COUNT III  
) THEFT, CLASS D FELONY I.C. 35-43-  
) 4-2

On this date, Juli Ann Batt came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana:

**COUNT I**

SUSANN RADFORD, on or about or between March 3, 2010 and June 29, 2010, In Marion County, State of Indiana, did recklessly, knowingly or intentionally exert unauthorized use of the personal services or property, that is: United States currency, <sup>\$6,000</sup> of an endangered adult, that is: BESSIE ROUSE, who is at least sixty (60) years of age, that is: ninety (90) years of age, for the person's own profit or advantage, or for the profit or advantage of another person;

**COUNT II**

SUSANN RADFORD, on or about March 5, 2010, In Marion County, State of Indiana, did knowingly exert unauthorized control over the property, to wit: U.S. currency, of another person, to wit: BESSIE

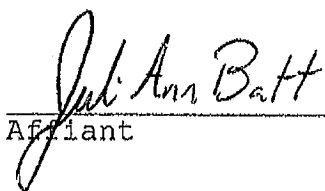
ROUSE, with the intent to deprive the person of any part of its value or use;

**COUNT III**


SUSANN RADFORD, on or about June 15, 2010, In Marion County, State of Indiana, did knowingly exert unauthorized control over the property, to wit: U.S. currency, of another person, to wit: BESSIE ROUSE, with the intent to deprive the person of any part of its value or use;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by IC. 35-44-2-1 that the foregoing representations are true.

  
Affiant

April 21, 2011  
Date

  
Deputy Prosecuting Attorney  
19th Judicial Circuit

State's Witnesses:  
J. Davis, D3792, MCPO/APS  
G. Dodson, H2928, IMPD  
Bessie Rouse  
Elizabeth Underwood  
Brandie Biszantz  
Representative of Teacher's Credit Union

AFFIDAVIT  
FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

Joie K. Davis

swears (affirms) that:

In March, 2010, Bessie Rouse, B/F/90/DOB/10/02/1919, who lives alone at 3121 Boulevard Place, Indianapolis, was the Victim of Theft and Fraud perpetrated by a black male subject and black female subject who used a ruse of being Police Detectives conducting criminal investigation and subsequently gaining her confidence and through intimidation and coercion exploiting thousands of dollars.

The case was assigned to Detective Gustavia Dodson of the IMPD who is currently conducting the investigation.

Due to concerns of Bessie Rouse living alone and possibly being victimized again, family, friends and members of her church congregation encouraged her to move and arrangements were made for Bessie Rouse to subsequently move in with her second cousin, SusAnn E. Radford, B/F/DOB/12/10/1953, at her residence located at 1024 Carroll White Drive, Indianapolis.

Bessie Rouse, who lives on a monthly fixed income from a small pension from Eli Lilly (\$300.00) and Social Security (\$1,239.00), authorized SusAnn Radford to be a joint tenant on her Eli Lilly Federal Credit Union account Chase account to assist in managing her finances. On 06/15/10 Eli Lilly Federal Credit Union issued a (SAR) Suspicious Activity Report on Bessie Rouse's account due to possible account fraud. The report identified Anthony Walton, B/M/DOB/04/08/1958 and SusAnn Radford as being involved in suspect activity concerning the account.

The Suspicious Activity Report was sent to IMPD Detective Gustavia Dodson who forwarded it to the Indiana Adult Protective Service and the case was assigned to Investigator Joie Davis.

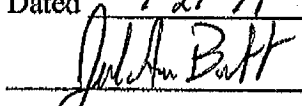
APS Investigator Davis contacted and interviewed Detective Dodson. Detective Dodson advised investigation had determined that Anthony Walton was Pastor Anthony Walton and was the legitimate POA for Bessie Lavenia Rouse but had caused suspicion from the Credit Union Staff simply because he was not familiar with the protocol for a POA in handling another person's finances. However, Detective Dodson stated there was concern about two withdrawals, totaling \$6,000.00 that involved SusAnn Radford.

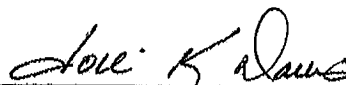
Bessie Rouse's Eli Lilly Credit Union account is funded only by her monthly Social Security check of \$1,239.00

I swear (affirm), under penalty of perjury as specified by I.C. 35-44-2-1, that the foregoing representations are true.

Dated

4-21-11

  
Deputy Prosecuting Attorney  
Nineteenth Judicial Circuit



Affiant

Judge  
Marion Superior Court  
Criminal Division, Room

)                      AFFIDAVIT                      )  
FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

Joie K. Davis

swears (affirms) that:

Credit Union documents obtained were reviewed and showed that on 03/05/10 a withdrawal of \$1,000.00 was made at Teacher's Credit Union (a shared branch), 2331 N. Meridian, Indianapolis, from Bessie L. Rouse's Eli Lilly Credit Union account.

Additionally, investigation determined that on 06/15/10 SusAnn Radford took Bessie Rouse to Eli Lilly Federal Credit Union, 225 South East St, Suite 300, Indianapolis, and at that time instructed Staff to withdraw \$5,000.00 from Bessie's account and issue a check to her for \$5,000.00 made payable to "Title Services". This transaction was done after Bessie Rouse gave her approval and signed the paperwork.

Investigator Joie Davis did contact and interview Eli Lilly Credit Union employee Elizabeth Underwood, who was present during the office visit with Bessie Rouse and SusAnn Radford; Elizabeth Underwood stated during the visit Bessie Rouse made some statements that concerned her. Bessie Rouse said during the meeting that Ms. Radford's brother had threatened to shoot her if she put any stress on Ms. Radford and when the transaction was completed she wanted her account back in her name only.

Investigator Davis interviewed Bessie Rouse about her knowledge of the bank transactions. Ms. Rouse, clearly confused and disoriented at times, stated she remembers going to Eli Lilly Credit Union with SusAnn Radford but stated she didn't understand that money was being taken out of her account at that time. Bessie Rouse further stated she was not aware of SusAnn Radford withdrawing \$1,000.00 from her account in March 2010, and she did not give her permission to do so. Bessie Rouse did say SusAnn Radford's brother, Richard Jones, did threaten her to "Bring his gun out there" if she caused her sister any stress.

On 06/29/10, SusAnn Radford came to the Indiana Adult Protective Services office, 251 E. Ohio St. Indianapolis, and after being given her "Advise of Rights" form, reading and signing same, gave a taped statement admitting to withdrawing the \$1,000.00 without Bessie Rouse's knowledge or approval. Additionally, SusAnn Radford stated she did take Bessie Rouse to Eli Lilly Credit Union on 06/15/10 and have her withdraw the \$5,000.00 from her account because she needed it for the closing on a home she was buying. SusAnn Radford added initially they both agreed the \$5,000.00 was a loan and would be paid back.

Furthermore, SusAnn Radford stated "I knew I was wrong" and advised Investigator Davis she

I swear (affirm), under penalty of perjury as specified by I.C. 35-44-2-1, that the foregoing representations are true.

Dated

4-21-11

John A. Batt

Deputy Prosecuting Attorney  
Nineteenth Judicial Circuit

Joie K. Davis

Affiant

Judge  
Marion Superior Court  
Criminal Division, Room

AFFIDAVIT  
FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

Joie K. Davis swears (affirms) that:

was willing to pay the money back.

As of this date no effort has been made by SusAnn Radford to pay back the 90- year -old Victim the money taken from her Social Security funds.

I swear (affirm), under penalty of perjury as specified by I.C. 35-44-2-1, that the foregoing representations are true.

Dated

4-21-11

*Jul Ann Britt*

Deputy Prosecuting Attorney  
Nineteenth Judicial Circuit

*Joie K Davis*

Affiant

Judge

Marion Superior Court  
Criminal Division, Room